

4. No basis exists for either party to assert prejudice in filing information subject to this motion under seal.
5. The confidential Settlement Agreement is intended to be used as an exhibit to support Defendant's Motion to Approve Settlement and Dismiss Case with Prejudice. Through the date of the filing of this motion, Defendant has not made public any of the information subject to this motion.

WHEREFORE, to provide for the matters described herein, Defendant respectfully requests that the Court grant its Motion to File Settlement Agreement Under Seal so that it may file the agreement as a confidential exhibit to Defendant's Motion to Approve Settlement and Dismiss Case with Prejudice.

DATED this 7th day of April, 2016.

Respectfully submitted,

By: 
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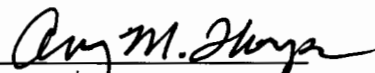
Lead Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was sent via U.S. Mail on this 7th day of April, 2016, to:

Wendy Kim McKenzie
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Plaintiff, Pro Se

By: 
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